

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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Executive Director

Southern District of New York
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March 27, 2023

Via ECF

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: United States v. Kakhaberi Jaoshvili
22 Cr. 559 (CM)**

Dear Judge McMahon,

We write to request that Your Honor order the United States Pretrial Services Office in the Southern District of New York to release Mr. Jaoshvili's United States passport. Mr. Jaoshvili's passport was surrendered to Pretrial Services during the pendency of his criminal case. On March 23, 2023, the Court imposed a sentence of time served in this matter. Pretrial Services has informed our office that it can only release Mr. Jaoshvili's passport pursuant to a Court order.

As such, we respectfully request that the Court order the return of Mr. Jaoshvili's passport to a representative of the Federal Defenders of New York.

Respectfully submitted,

/s/

Neil P. Kelly
Assistant Federal Defender
(212) 417-8744

cc: AUSA Thane Rehn

SO ORDERED:



HON. COLLEEN McMAHON
United States District Judge
Dated: March 27, 2023
New York, New York

USDC SDNY
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